

*Constantine verifies exclusive Kaiser dealings in defense of Eufora litigations...*

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12 **UNITED STATES DISTRICT COURT**  
13 **EASTERN DISTRICT OF NEW YORK**

14 **THEODORE R. HUGHES, ETHEL**  
15 **KAISER, NICK PRIVITELLO, ROBERT J.**  
16 **RIZZI,** Plaintiffs,  
17 v.  
18 **TOMMY CONSTANTINE,**  
19 Defendant.

20 **CASE NO. CV11-2692-SJF-WDW**

21 **DECLARATION OF TOMMY**  
22 **CONSTANTINE IN SUPPORT OF**  
23 **THE RESPONSE AND OPPOSITION**  
24 **TO PLAINTIFFS' REQUEST FOR**  
25 **PRELIMINARY INJUNCTION**

26  
27 Defendant Tommy Constantine, being duly sworn, upon oath, deposes, and says as  
28 follows:

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30 1 29. During all negotiations prior to the Plaintiffs transmitting their money, I dealt  
31 2 exclusively with John Kaiser.